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By: SPERO T. LAPPAS, Esquire  
Pa. Supreme Court identification no. 25745  
ATTORNEY FOR PLAINTIFF

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

CINDY L. RIGG,  
Plaintiff

v.

COUNTY OF DAUPHIN,  
DAUPHIN COUNTY SHERIFF'S  
DEPARTMENT,  
RALPH McAlister,  
Defendants

:  
:  
: CIV ACTION NO. 4:CV-01-0967  
:  
: JURY TRIAL DEMANDED  
:  
:  
:  
: (JUDGE McCLURE) ✓

PLAINTIFF'S MOTION FOR AN ENLARGEMENT OF TIME TO RESPOND TO  
DEFENDANTS' MOTIONS UNDER RULE 12 AND FOR SUMMARY JUDGMENT,  
AND FOR LEAVE TO FILE A CONSOLIDATED BRIEF

1. All defendants have filed motions to dismiss or for summary judgment seeking to dismiss the Plaintiff's complaint.

2. Defendant McAllister has not yet filed his brief, the County defendants served their brief by mail on July 24, 2001. Plaintiff's Brief in opposition to the County's Motion would be due on August 13, 2001.

3. Plaintiff desires to file one consolidated Brief at such time as her Brief in Opposition to McAllister's Motion would be due.

4. All counsel concur.

WHEREFORE, the plaintiff requests that she be granted an extension of time up to and including the time for filing her brief in opposition to McAllister's Motion to Dismiss or for Summary Judgment to file a consolidated Brief in opposition to all pending motions.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

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ATTORNEY FOR DEFENDANT

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CERTIFICATE OF CONCURRENCE

I hereby certify that on all counsel concur in this motion.

RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on this date I served a true copy of the attached document upon the person(s) named below by mailing a copy addressed as follows, postage pre-paid, deposited into the U. S. Mail at Harrisburg, Pa.

JAMES YOUNG, ESQUIRE  
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RESPECTFULLY SUBMITTED,

The Law Offices of SPERO T. LAPPAS

By:  \_\_\_\_\_

August 9, 2001